

SANTA MONICA MOUNTAINS CONSERVANCY

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April 30, 2007

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Los Angeles County Department of Regional Planning
320 West Temple Street
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**Comments on Notice of Consultation for Tract No. 52652
Adjacent to Upper Las Virgenes Open Space Preserve**

Dear Mr. McCarthy:

Rare is it that a mass grading (one million cubic yards) project next to two City-owned parks and the premier State-owned wilderness park in the Simi Hills is proposed in unincorporated Los Angeles County. The proposed 40-acre grading footprint on the subject 58-acre property would result in significant, adverse visual impacts to Conservancy-owned Upper Las Virgenes Open Space Preserve, Knapp Ranch Park and El Escorpion Park. The complex terrain of the site is visible from public parkland from all possible angles. The Conservancy disagrees with the County's Initial Study that the project's visual impacts can be mitigated to a level less than significant. An Environmental Impact Report is essential to allow decision makers to assess less visually damaging alternatives.

Incompatibility of Proposed Project with Site Topography and Drainage

The topography of the site provides for a single approximately 15-acre, semi-shielded natural bowl area into which development can be located. This bowl most assuredly was filled in approximately between 1965 and 1975 as evidenced by a tall north-facing fill slope with v-ditches and a down drain. Approximately 75 percent of the entire 58-acre property drains to the bottom of this fill slope. The proposed project would cut all of the ridgelines on the subject property to further fill this natural bowl and push the limit of fill approximately 200 feet northward to the boundary of El Escorpion Park, approximately 40 feet from one of the most popular hiking trails in the San Fernando Valley. The fill slope would be at least 500 feet in horizontal depth, from toe of slope to lot level, and at least 200-feet-high. The proposed project does not fit the inherent topographic constraints of the site if it requires such an unprecedented massive fill slope.

A major constraint of building on the subject property is the need to raise the elevation of the development area's low point to a height equal to the intersection of Randiwood Lane and Welby Way. Most certainly County regulations do not permit the release of tens of thousands of gallons of suburban runoff directly into a City-owned wilderness park and riparian habitat area. The proposed massive fill slope rising from the El Escorpian trail is a direct result of the need to take 45 acres of what is now clean natural drainage area to be converted in suburban uses and to be able to get it into the storm drain system. Most likely the short extension of Welby Way across the City boundary to the proposed detention basin access road is an artifact of the City's prohibition of accepting drainage from unincorporated areas being directly released into storm drain system on City streets.

In short the project uses mass grading of many landforms to make a large lot, 25-home subdivision fit where only an approximately 15-acre project can be developed without unavoidable significant adverse visual impacts. If it is imperative that the project have a new water tank located within 70 feet of the Upper Las Virgenes Open Space Preserve on a prominent plateau, then an additional two acres of grading disturbance footprint would have to be part any project that remained in the natural bowl area described above.

Reduced Project Footprint - Park Viewshed Protection Alternative

The Conservancy requests that the following park viewshed projection alternative with twenty lots be included in the Draft Environmental Impact Report (DEIR). All of the project grading would be confined to a footprint outlined by the following boundaries. The boundary utilizes the ridgelines of the natural protected bowl area. All of the referenced points are shown on the on the tract map circulated with the Notice of Consultation.

It must be emphasized that a comprehensive viewshed analysis of the proposed project and each DEIR alternative must be included in the DEIR. However, this recommended Park Viewshed Protection Alternative provides a solid base for a project that minimizes adverse viewshed impacts while providing a large development footprint.

The central entrance point to the tract would remain the same between lots 25 and 10. All of the area shown within the following lots could or would be entirely graded: lots 1,2,3,8,9,10,11,18,19,20,21,22,23,24 and 25. That is fifteen whole lots including slopes.

Five additional partial (smaller than 0.5 acre) lots would be included in the footprint. The pad (non-cut slope) area of lot 17 would or could be gradable. The flat pad (non-cut slope) area of lot 16 would or could be gradable for only those portions in the El Escorpian

watershed. The flat pad (non-cut slope) area of lot 16 would or could be gradable for only those portions in the El Escorpián watershed. All portions of lot 7 in the El Escorpián watershed would or could be gradable. Lots 11 and 12 would have driveways on Randiwood Lane and all grading must be confined to the eastern half of each lot. The toe of the big fill slope on the northern grading footprint boundary could not extend more than 40 feet northward from the existing toe of slope. An extension of more than 40 feet would result in unacceptable trail viewshed impacts.

The detention basin would be smaller and located approximately where it is shown on the tract map. The applicant would establish 40 five-gallon oak trees and 40 California black walnut trees in the area at the bottom of the fill slope, watered to the extent possible by the concentrated runoff from the slope.

If a water tank for the Las Virgenes Municipal Water District is necessary, than a minimum grading access road cut into the hillside at the back of lots 19-21 should be included as shown on the tract map circulated with the Notice of Consultation. The water tank and recreation complex access road shown on the tract map involves so much grading purely as an artifact of the mass grading for the proposed lots below and the large pad for the 0.89-acre Recreation Lot.

Additional Comments

The Conservancy's recommended 20-lot DEIR alternative includes 15 lots with a minimum size of 0.75 acres and pads in excess of 15,000 square-feet. The other five lots on average include 0.35 acres gross and minimum 10,000 square-foot pads. All of these lots dwarf those in the immediately surrounding neighborhood. The applicant should have adequate flexibility within this grading envelope to mix and match product type and result in an economically feasible project. There are no overriding considerations to public benefit to allow a grading footprint that exceeds that recommended in the Conservancy's alternative project. If housing is needed, within the proposed Conservancy footprint, the applicant can build over 30 houses equivalent in size to those on Randiwood Lane.

If the applicant states that only the proposed project will support the necessary project infrastructure, then that complete economic analysis must be transparent and fully available to decision makers and the public. The County is under no obligation to approve a project with unavoidable, significant adverse visual impacts to three large public parks because somebody paid too much for a piece of property. The Conservancy's recommended

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Reduced Project Footprint - Park Viewshed Protection Alternative, or some closely equivalent project, provides a strong economic return on the subject property.

Please direct any questions and all future correspondence to Paul Edelman of our staff at the above address and by phone at (310) 589-3200, ext. 128.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson